

Delta Vision Blue Ribbon Task Force
Comments on Delta Vision Strategic Plan
By Jay Kremer, PE

My name is Jay Kremer and I am a California Registered Civil Engineer with over thirty years of environmental engineering experience. I have a BS in civil engineering, an MS in environmental engineering and a master's degree in public administration. I live in Fullerton, California and am a member of the Citizens Infrastructure Review Committee of the City of Fullerton, which gave me your plan document for review. This information is furnished as support for the following comments.

The report contains much data and information on the delta area and what needs to be done to repair damages to the delta environment. The information is very detailed and must have been prepared by a consultant well experienced with the delta situation. I will admit to little knowledge of the delta area so my comments will not address this information.

The basic premise of the strategic vision is questioned where the needs of people for water are established as coequal to that of bringing the delta area back to an environmental pleasing condition. This seems to be beyond common logic where usually human life and human living conditions are superior to those of lower animals and plants.

The most egregious example of maintaining the worth of lesser creatures over mankind occurred in the late 1950s when the World Health Organization had almost eradicated the scourge of malaria from the world through use of DDT. Only a few hundred thousand deaths a year were occurring in inaccessible areas of third world countries as opposed to four to five millions deaths a year from malaria prior to DDT use.

With the discovery that DDT caused raptors and other birds to have breeding problems and through the message of books like Rachel Carson's Silent Spring, DDT was banned. Since that time, for over 50 years, two to three million persons a year, mainly children, have died from malaria. In addition many millions suffer malaise and illness from the disease. Did 100 to 150 million children have to die to allow raptors to propagate?

Not to belabor this history, but the statements in the plan that each area of the state needs to be self-sufficient in water supply ignores the fact that the north of the state has a surplus of water while the south is water deficient. Plans to have 100-percent recycle of water in the south of the state to avoid or severely limit imports from the north appears to be taking a quite limited view of the fact that California is one state and not two. Taxes from the south of the state impact the whole state as should water in the state be available to the whole state.

Many of the suggestions made in the plan are worthwhile. For example, improved recycling of wastewater through advanced treatment can make a very large amount of water available but at a high cost. The costs for tertiary wastewater treatment and costs for removal of dissolved solids in wastewater are expensive both in money and in energy.

All advanced treatment methods need energy and removal of dissolved solids requires much energy. In this time of concern about carbon footprints of industrial processes and the cost of energy, the large energy needs for advanced wastewater treatment will necessarily create significant carbon emissions and treatment costs..

Recommendations for retaining excess runoff of rainwater through storage and ground water infiltration are valid and worthwhile. These proposals will require significant engineering and scientific study to maximize their benefits and avoid environmental harm. Storage dams can be a source of harm to fish and can prevent normal sediment flows.

As stated above, the amount of effort going into the description of the current problems with the delta and the proposed solutions is impressive. It is assumed that some consulting firm was hired to prepare this plan. While this work was certainly guided by the desire to cure the deltas problems, the cures proposed are the result of scientific and engineering effort. Any actual efforts to correct the problems in the delta should also be guided by such technical efforts.

This is why your envisioned governmental structure is believed to be non-functional. You have placed a political body in direct charge of a technical problem. Your requirement to be able to control the engineers and scientists in the Delta Ecosystem and Water Council by appointing only those that have your same vision ignores the fact that science and engineering are not driven by policies but by technical facts. Policies can shape the solutions found by technical investigations but will ultimately fail to create the desired solution if technical fact is driven by the need to find a desired result.

It is suggested that a viable structure to obtain the maximum benefit to both the environmental needs of the delta and the water supply needs of the south is to establish a single purpose agency that has been so successful in California in many areas. Single purpose agencies like the Metropolitan Water District and many county sanitation and county water districts perform their tasks successfully by concentrating on the technical aspects of the problem. The essence of these agencies is that they are similar to private industry, with a chief executive directing the organization and general guidance furnished by a board of directors. A single purpose agency with sufficient authority to implement technically reasonable solutions is suggested to be the best structure to address the problems.

The problems of the delta and the need for more water supplies in the south are not problems that will be solved by snapshot consultants and lengthy reports of conditions at one point in time. Difficult solutions require consistent and inspired work of engineering and scientific personnel for significant periods to investigate solutions, discard the many that are unsuitable and select those that will technically work. A management structure that gives these technical persons the time and resources to achieve the desired goals will be well worthwhile. As nature as well as mankind is not stagnant, experienced engineers and scientists on the staff of a single purpose agency will be capable to adjust solutions to fit changing conditions.

The structure of the single purpose agency should be separated from direct political input except through the general guidance of their board of directors. The solution to finding that the organization is not functioning correctly would be to obtain a new chief executive as is done in private industry.

The proposal in the plan to establish an agency like the Coastal Zone Commission will ensure that law suits will be the overriding guidance of the effort. The plan appears to envision an agency that will direct in a major way how and where people will live. The vision to establish satellite cities around the delta and to restrict any development in areas, including existing cities, that is not approved by the new agency will engender much controversy and lawsuits. The far reach of the existing Coastal Zone Commission to restrict life styles it disfavors has created much dissatisfaction with its efforts.

It is suggested that a single purpose agency charged with finding technically feasible solutions to the problems will not generate many lawsuits. If lawsuits result, technical facts and not life style policies should make the lawsuits easier to resolve.

Thank you for the opportunity to comment on your Delta Vision Strategic Plan. If you have any questions about my comments, I may be reached at;

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